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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

CARLIE SHERMAN, ANNA GOZUN,  
AMANDA NASH, and JOHN DOE on behalf  
Of themselves and all similarly situated persons,

Plaintiffs,

vs.

Civil Action No. 20-CV-215-5

TRINITY TEEN SOLUTIONS, INC., a  
Wyoming corporation; TRIANGLE CROSS  
RANCH, LLC, a Wyoming limited liability  
Corporation; MONKS OF THE MOST  
BLESSED VIRGIN MARY OF MOUNT  
CARMEL, d/b/a MYSTIC MONK COFFEE, a  
Wyoming corporation; GERALD E.  
SCHNEIDER; MICHAEELEEN P.  
SCHNEIDER; ANGELA C. WOODWARD;  
JERRY D. WOODWARD; DANIEL  
SCHNEIDER; MATHEW SCHNEIDER;  
MARK SCHNEIDER; KARA WOODWARD;  
KYLE WOODWARD; THOMAS GEORGE;  
JUDITH D. JEFFERIS; DALLY-UP, LLC, a  
Wyoming limited liability corporation; ROCK  
CREEK RANCH, INC., a Delaware corporation;  
DIOCESE OF CHEYENNE, a Wyoming  
Corporation; and the SOCIETY OF OUR LADY  
OF THE MOST HOLY TRINITY, a Texas  
Corporation; and NEW MOUNT CARMEL  
FOUNDATION, INC., a Wyoming corporation.

Defendants.

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**MOTION TO DISMISS**

Defendants Judith D. Jefferis and Rock Creek Ranch, Inc. (hereinafter “Defendants”), through their attorneys Crowley Fleck PLLP, and pursuant to Federal Rules of Civil Procedure 12(b)(6) hereby move to dismiss the claims of Plaintiffs against Defendants for failure to state a claim upon which relief may be granted. Defendants have submitted their supporting Brief contemporaneously with this Motion. For the foregoing reasons and those reasons contained in the supporting Brief, Defendants respectfully request that the Court dismiss Plaintiffs’ claims against Defendant.

DATED this 19th day of January, 2021.

JUDITH D. JEFFERIS and ROCK CREEK RANCH  
INC.,

By: /s/Timothy M. Stubson  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 19<sup>th</sup> day of January, 2021, a true and correct copy of the foregoing document was filed and served on the following, via the U.S. Postal Service, first-class, postage prepaid, addressed to the following:

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/s/Timothy M. Stubson  
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